

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

1285 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10019-6064
TELEPHONE (212) 373-3000

BEIJING	TOKYO
HONG KONG	TORONTO
LONDON	WASHINGTON, DC
LOS ANGELES	WILMINGTON
SAN FRANCISCO	

DIRECT DIAL: (212) 373-3289
EMAIL: ASOLOWAY@PAULWEISS.COM

August 30, 2024

BY ECF

Honorable James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Gould et al. v. City of New York, No. 24 Civ. 1263 (RPK) (JRC)

Dear Judge Cho:

We represent Plaintiffs in the above-captioned case. We write jointly with Defendant pursuant to Rule E of the Court's Individual Practices to request that the Court enter the Proposed Confidentiality Order negotiated by the parties in this case.

The parties' Proposed Confidentiality Order is identical to the Court's Form Confidentiality Order in all respects except that it edits the categories of documents and information that may be designated confidential to reflect the needs of the case. In particular, the Proposed Confidentiality Order permits the parties to mark "Confidential" documents and information concerning the New York City Administration for Children's Services investigations of Plaintiffs, foster care and family court records concerning Plaintiffs, the identities of Plaintiffs' children, the identity of Plaintiff Jane Doe 1 and her children, and information whose confidentiality is protected by federal, state, or local law.

In accordance with Rule E, a clean version of the Proposed Confidentiality Order is attached as Exhibit 1, and a redlined version identifying the parties' proposed changes from the Court's Form Confidentiality Order is attached as Exhibit 2.

We thank the Court for its consideration of this request.

Respectfully Submitted:

FAMILY JUSTICE LAW CENTER, INC.

David Shalleck-Klein (dshalleckklein@fjlc.org)
Eliza J. McDuffie (emcduffie@fjlc.org)
41 Madison Ave., 40th Floor
New York, New York 10010
Telephone: (212) 223-6939

EMERY CELLI BRINCKERHOFF ABADY WARD &
MAAZEL LLP

Katherine Rosenfeld (krosenfeld@ecbawm.com)
Max Selver (mselver@ecbawm.com)
600 Fifth Avenue, 10th Floor
New York, New York 10020
Telephone: (212) 763-5000

NYU SCHOOL OF LAW FAMILY DEFENSE CLINIC
/ WASHINGTON SQUARE LEGAL SERVICES, INC.

Christine Gottlieb (gottlieb@mercury.law.nyu.edu)
Anna Arons (aronsa@stjohns.edu), Of Counsel
245 Sullivan Street, 5th Floor
New York, New York 10012
Telephone: (212) 998-6693

PAUL, WEISS, RIFKIND, WHARTON & GARRISON
LLP

/s/ Audra J. Soloway

Audra J. Soloway (asoloway@paulweiss.com)
Erin J. Morgan (ejmorgan@paulweiss.com)
Daniel A. Negless (dnegless@paulweiss.com)
Y-Tze Patrick Lim (plim@paulweiss.com)
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000

Attorneys for Plaintiffs

ACTING CORPORATION COUNSEL OF
THE CITY OF NEW YORK

Muriel Goode-Trufant
Thomas Lindeman
Cindy Singh
Mark Toews
100 Church Street
New York, New York 10007
Telephone: (212) 356-0418

Attorney for Defendant